

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

BRANDON CAIRE,)	
)	
)	
Plaintiff,)	
)	
v.)	Case No.: 1:13-cv-1216-RDB
)	
CONIFER VALUE-BASED CARE, LLC, et al.,)	
)	
)	
Defendants.)	
)	

**CONSENT MOTION TO EXTEND TIME TO
ANSWER OR OTHERWISE RESPOND TO COMPLAINT**

COMES NOW Defendant Conifer Health Solutions, LLC (“Conifer Health”), through undersigned counsel, and pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Local Rule 105(9), with the consent of Plaintiff, files this Consent Motion to Extend Time. Specifically, Conifer Health moves this Court to extend the time in which to respond to Plaintiff’s Complaint for a period of fourteen (14) days from June 13, 2013 (the date Conifer Health’s responsive pleading is currently due), up to and including June 27, 2013. In support of this motion, Conifer Health states the following:

1. Conifer Health was served with a copy of Plaintiff’s Complaint and Summons on May 23, 2013.
2. Accordingly, pursuant to Fed. R. Civ. P. 12(a)(1)(A)(i), Conifer Health’s responsive pleading is due twenty-one (21) days after service of the Summons and Complaint, which is June 13, 2013.

3. Undersigned counsel for Conifer Health requires additional time to investigate the allegations of the Complaint and to prepare an appropriate response.
4. Accordingly, Conifer Health respectfully requests an extension of fourteen (14) days, until and including June 27, 2013, to answer or otherwise plead in response to the Complaint.
5. This motion is not brought for purposes of delay or any other improper purpose, and is being made before the expiration of the current deadline.
6. Conifer Health has not previously filed or requested an extension to respond to the Complaint.
7. Counsel for Conifer Health has contacted Ruth Ann Azeredo, Esq., counsel for Plaintiff, regarding this extension motion and Ms. Azeredo consents to this motion.
8. A proposed order is attached.

WHEREFORE, Defendant Conifer Health respectfully requests that the Court grant this motion to extend time for Defendant Conifer Health to answer or otherwise plead in response to the Complaint until and including June 27, 2013.

Respectfully submitted,

/s/ John S. Bolesta
Ginger McCauley (Bar No. 26735)
John S. Bolesta (Bar No. 28115)
OGLETREE, DEAKINS, NASH, SMOAK & STEWART
1909 K Street, N.W., Suite 1000
Washington, D.C. 20006
(202) 887-0855 (Tel.)
(202) 887-0866 (Fax)
ginger.mccauley@odnss.com
john.bolesta@odnss.com

Counsel for Defendant Conifer Health Solutions, LLC

CERTIFICATE OF SERVICE

I hereby certify, that on this 12th of June, 2013, a true and correct copy of the foregoing document, together with a proposed Order, were served on all counsel of record via the Court's ECF system.

/s/ John S. Bolesta